

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

CINSAY, INC.,

Plaintiff,

vs.

JOYUS, INC.,

Defendant.

§
§
§
§
§
§
§
§
§

CIVIL ACTION NO. 3:13-cv-3628-K

JURY TRIAL DEMANDED

JOINT MOTION TO DISMISS WITHOUT PREJUDICE

Cinsay, Inc. and Joyus, Inc., pursuant to FED. R. CIV. P. 41(a)(2) and (c), move for an order dismissing all claims and counterclaims by and between them in this action without prejudice, subject to the terms of the parties' Settlement Agreement, with each party to bear its own costs, expenses and attorneys' fees.

Dated: April 3, 2015

Respectfully submitted,

By: /s/ Olga A. Bograd

Jamil N. Alibhai
Texas State Bar No. 00793248
jalibhai@munckwilson.com
Jason Blackstone
Texas State Bar No. 24036227
jblackstone@munckwilson.com
Jacob L. LaCombe
Texas State Bar No. 24070098
jlacombe@munckwilson.com
Olga A. Bograd
Texas State Bar No. 24075613
obograd@munckwilson.com
MUNCK WILSON MANDALA, LLP
12770 Coit Road, Suite 600
Dallas, Texas 75251
Telephone: 972.628.3600
Telecopier: 972.628.3616

**COUNSEL FOR PLAINTIFF
CINSAY, INC.**

/s/ James C. Yoon

Jeffrey F. Wood
Texas State Bar No. 24025725
jeff.wood@jcmfirm.com
JONES CARR MCGOLDRICK, LLP
5910 North Central Expwy, Suite 1700
Dallas, Texas 75206
Telephone: 214.828.9200
Telecopier: 214.828.9229

James C. Yoon (*pro hac vice*)
jyoon@wsgr.com
**WILSON SONSINI GOODRICH &
ROSATI PC**
650 Page Mill Road
Palo Alto, California 94304
Telephone: 650.493.9300
Telecopier: 650.493.6811

Jennifer J. Schmidt (*pro hac vice*)
jschmidt@wsgr.com
**WILSON SONSINI GOODRICH &
ROSATI PC**
One Market Plaza
Spear Tower, Suite 3300
San Francisco, California 94105
Telephone: (415) 947-2000
Facsimile: (415) 947-2099

**COUNSEL FOR DEFENDANT
JOYUS, INC.**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing document was served on counsel of record via CM/ECF, in accordance with the Federal Rules of Civil Procedure, on April 3, 2015.

/s/ Olga A. Bograd
Olga A. Bograd

653901